

DEC 04 1990

Mr. Kevin Cunningham
Technical Monitor
PRC Environmental Management
650 Minnesota Avenue
Kansas City, Kansas 66101

RE: Work Assignment R07015
Hydrocarbon Recyclers, Inc. (HRI) RFA

Dear Mr. Cunningham:

We have reviewed the draft Preliminary Assessment Report for the above referenced facility. Please revise the report according to the comments below.

COMMENTS ON HRI RFA

1. Section 3.1.1 should discuss any property uses before Enmar Paint Company.
2. Figure 2.2 should clearly identify the North and South plant.
3. On page 3-2, second paragraph, please explain what is meant by the term "free solvent."
4. Section 3.1.2 should discuss all past operations at the North plant before its use by Reid Supply Company.
5. On page 3-4, first paragraph, please describe what information is included in a waste "profile."
6. From the text on page 3-4 and other places it is not altogether clear what types of wastes go to building B as opposed to building C.
7. In the last sentence of page 3-4, please clarify what is meant by the word "accordingly."

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HARRINGTON

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RCRA Records Center

8. In the first paragraph of page 3-6 and many other places throughout the report, it is reported that Stoddard solvent is used to rinse the empty drums. At the time of the VSI it was EPA's understanding that diesel fuel was used for the rinsing. This understanding appears to be supported by the last sentence of the third paragraph of page 4-1. Please clarify this apparent discrepancy.
9. Referring to the text under "April 5-6, 1984" on page 3-9, does the CEI describe the exact locations of the leaking drums? If so, this information should be documented in the report.
10. There is a typographical error in the first sentence of the second paragraph of page 3-13.
11. Please include another figure 2.2 in section 4.0 for ease of reference.
12. Referring to the first sentence of the second paragraph of page 4-1, the southern and northern half of what?
13. On page 4-2 and throughout the report, please give each SWMU a number and a description (e.g., SWMU #1 - Process Area Storage Tanks). This same comment applies to Areas of Concern.
14. Section 4.1.3 should discuss the evidence of spillage around the piping manifold, observed during the VSI.
15. A diagram of building K and all process areas described in section 4.2 would be an extremely informative addition to the report. The diagram should clarify which areas are essentially outside but covered, and those areas inside buildings. (See page 2 of 10 in the VSI notes.)
16. The last sentence of the first paragraph on page 4-5 discusses one option for processing drums but does not discuss others.
17. In the first sentence of the third paragraph on page 4-5, please clarify what is meant by saying the blending and processing area is ramped.
18. In section 4.2.1, please describe the catch tank in more detail (e.g., above or below ground, etc.).
19. Section 4.2.3 should discuss the significant amounts of wastes dripping off the drum rinse gun onto a deteriorating concrete slab, which were observed during the VSI. Section 4.2.4 should discuss the implications of this observation.

20. Are the results of the analysis mentioned in paragraph 3 of page 4-7 available for BVWST's review?
21. Was the former drum processing area at or above grade?
22. Given the releases described in section 4.3.3, the overall potential for release should be moderate to high.
23. Does the central sump in section 4.4.1 have an outlet?
24. Throughout the report, please discuss any pressure tests or other testing performed on any piping (above or below ground) associated with waste management.
25. Please describe the purpose of the bermed area mentioned in the first paragraph of page 4-14.
26. SWMUs and areas of concern should be discussed in two separate sections of the report.
27. The parenthetical information in the first sentence of section 4.10.1 should be included in section 3.2.
28. In section 4.10.2, please give a more complete description of the catch basin including where it is located.
29. In section 4.11, please describe the process for transferring crushed drums from the crusher to the roll-off boxes.
30. In section 4.12.1, please clarify whether the warm room has a drain and, if so, where it drains to.
31. In section 4.13.3, please clarify whether the EP toxicity procedure was performed on the samples, or whether total metal analysis for EP toxicity metals was performed.
32. In section 4.21.4 and other Potential for Release sections, past waste handling activities should be considered when rating release potential.
33. Are the units in the last sentence of section 5.2.1 correct?
34. Referring to Table 5-1, under 3. Former Drum Processing Area, BVWST should try to obtain documents related to the closure of this area and review the indications of release and the clean-up of any release.

35. Page 3 of the notes from the VSI indicates that standing water in or near the dock area is pumped onto the ground. The text of the report should discuss this practice in more detail as well as the implications of this practice.
36. The former drum processing area and building J appear to meet the qualifications for SWMU status and should be included in the SWMU section of the report.
37. The following units/areas should also be reexamined by BVWST for possible SWMU status: distillation feed tanks, refined enamel tank, refined lacquer tank, crude feed stock tank, filtering tank, settling tank, still, building I and the areas to the north and northeast of building I.
38. The Kansas Department of Health and Environment (KDHE) has reviewed the draft report and provided EPA with its comments. Please review the enclosed KDHE comments and make appropriate revisions to the report.
39. For SWMUs or areas of concern where there is evidence of a release of hazardous constituents or a high likelihood that releases have occurred, all the recommendation sections should indicate that EPA may wish to require sampling under 40 CFR 270.14(d)(3).

We have decided not to require a sampling visit at this time. Therefore, the revised RFA should be written as if it were the final RFA report. Only one copy of the revised report need be submitted. After EPA approval of the revised report, we will need three additional copies.

If you have questions or wish to discuss responses to these comments, please contact Mark Matthews at (913) 551-7635.

Sincerely yours,

Lyndell L. Harrington, P.E.
Chief, Permits Section
RCRA Branch
Waste Management Division

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

DEC 04 1990

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650 Minnesota Avenue
Kansas City, Kansas 66101

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Sincerely yours,

Lyndell L. Harrington

Lyndell L. Harrington, P.E.
Chief, Permits Section
RCRA Branch
Waste Management Division

Enclosure



State of Kansas

Mike Hayden, Governor

Department of Health and Environment Division of Environment

Stanley C. Grant, Ph.D., Secretary

Forbes Field, Bldg. 740, Topeka, KS 66620-0002

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PRMT-SECTION

Respond to: (913) 296-6247
FAX (913) 296-6247

October 22, 1990

Mr. Mark Matthews
RCRA Permit Section
U.S. Environmental Protection Agency Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: Hydrocarbon Recyclers RFA
Wichita, Kansas
EPA I.D. Number KSD007246846

Dear Mr. Matthews:

The Kansas Department of Health and Environment has reviewed the draft RCRA Facility Assessment report for Hydrocarbon Recyclers, Inc. in Wichita, Kansas. We have the following comments:

1. KDHE would like to note for EPA's information that Buildings I and J at HRI's facility were given interim status for the ~~storage of hazardous waste in August 1990.~~ At the time the VSI was being conducted, it was unclear where these two buildings fit into the hazardous waste management operations being conducted by HRI. They are now considered to be a part of the HRI facility.
2. Page 3-3 of the report states in Section 3.2 that HRI is conducting, among other activities, disposal of hazardous wastes. This is incorrect; the Wichita facility has interim status for storage and treatment activities only. To our knowledge, HRI has never conducted hazardous waste disposal activities on-site.
3. Item 1 contained in Table 5-1, Process Area Storage Tanks, appears to recommend that HRI perform ultrasonic thickness testing on the piping associated with these tanks. KDHE would like to point out that this type of testing is not required to be conducted by either 40 CFR 264 or 265 Subpart J standards. Therefore, it is not anticipated that this activity will be a requirement of HRI's RCRA operating permit.

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Charles Konigsberg, Jr., M.D., M.P.H.,
Director of Health
(913) 296-1343

James Power, P.E.,
Director of Environment
(913) 296-1535

Lorne Phillips, Ph.D.,
Director of Information
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(913) 296-1415

Roger Carlson, Ph.D.,
Director of the Kansas Health
and Environmental Laboratory
(913) 296-1619

4. Item 7 contained in Table 5-1, Elevated Tanks Storage Area, recommends that secondary containment be provided for the tank piping being discussed. KDHE would like to point out that secondary containment is not required for piping if the conditions of 40 CFR 265.193(f) are met. KDHE will be conducting a detailed review of these tank systems as part of the Part B review. If the conditions of 264.193(f) are met, it is anticipated that secondary containment for this piping will not be a requirement of HRI's RCRA operating permit.
5. It is recommended in Table 5-1 that the areas discussed as items 15 and 16 be provided with secondary containment. KDHE believes at the present time that HRI meets 40 CFR 265 Subpart I secondary containment requirements for interim status container storage areas. For those units storing solid hazardous wastes that meet the requirements of 40 CFR 264.175(c), there is no regulatory requirement for secondary containment. This will be taken into account when reviewing HRI's Part B permit application. HRI, however, has indicated that they will be providing secondary containment for these two areas before the issuance of a RCRA operating permit.
6. Table 5-1 contains recommendations that KDHE require a closure plan for items 21 through 23 -- buildings I and J and the open area north of Building I. KDHE believes that in order to have the authority to require a closure plan for these areas under 40 CFR 265, these areas would need to have been previously regulated as interim status hazardous waste management units. While Buildings I and J did recently gain interim status as storage units, the area north of Building I has not been granted interim status according to our records. During the time these areas were used for the distillation of waste solvents, approximately 1981-mid 1985, these areas were not considered to be regulated as hazardous waste storage or treatment areas. The actual distillation activities conducted were exempt from being regulated as treatment and the wastes being recycled through these units were also exempt at that time from regulation as hazardous wastes due to the fact that they were being recycled. Therefore, KDHE believes that it would be more appropriate for EPA to conduct any additional investigative or remedial activities deemed necessary in these three areas under corrective action authority.

Mr. Mark Matthews
October 22, 1990
Page 3

KDHE appreciates the opportunity to review and comment on the draft RFA report for the HRI facility. Should you have any questions concerning these comments please call me at (913) 296-1612.

Sincerely,

Brenda Clark

Brenda Clark
Environmental Engineer
Hazardous Waste Section
Bureau of Air and Waste Management

C Teresa Hansen

hrirfa.bc